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Kelly Ann Fennell Director

April 10, 2003

Ms. Dorothy Wideman Executive Secretary Michigan Public Service Commission 6545 Mercantile Way P.O. Box 30221 Lansing, MI 48909

Re: MPSC Case No. U-12320

SBC's Line Loss Notification Interruption Report

Dear Ms. Wideman:

Pursuant to the Commission's Order issued on March 26, 2003 in this docket, please find enclosed for filing an original and fifteen (15) copies of SBC Michigan's Line Loss Notification Interruption Reports for:

- January, 2003 (Revised)
- February, 2003 (Revised)
- March, 2003

The Commission's Order required SBC to provide updated versions of the previously filed January and February Reports to reflect the new level of information required from the approved Line Loss Notifier Communications Plan ("the Plan"). These updated data include: total line loss notifiers sent for both Michigan and on a regional basis for the three previous months; and, counts of affected line loss notifiers for reported incidents on a regional basis, for Michigan (where available), and by month for the affected period.

Additionally, SBC has made two additional updates to these reports. In the spirit of the requirement now included in the Plan to provide an update on an incident not resolved in the month reported, the January report has been updated to reflect a LLN interruption that was identified in December 2002, but not resolved until January 2003. Since the February Report was being updated in response to the Commission's Order, SBC has updated the data shown for the first incident listed on the report.

LLN Notifier Interruption Report Filing April 10, 2003 Page 2

The format of the report has been updated to ensure the inclusion of all the information required, while still maintaining the readability of the report. For each month, the report itself will show a summary of the incident, provide the quantitative information, as well as CLEC notification information. Additional detail for a given incident is now contained in an attachment to the report as necessary.

Finally, the overall line loss notifier volume data reflects mechanized line loss notifiers sent, as well as those line loss notifiers sent via fax when requested by the CLEC. This includes line loss notifiers sent to CLECs for both CLEC-to-CLEC migration and for "winback" scenarios. Because of the recent change in the business rules for performance measure MI 13 (related to mechanized line loss notifier timeliness), data was estimated for the total volumes reported for October 2002 through February 2003. This was necessary to include line loss notifiers sent to CLECs due to "winback" activity. Beginning with March 2003 volume data (which will first appear on the May 2003 LLN report to be filed by June 10, 2003), SBC will be able to use performance metrics data from the implementation of the new business rules for performance measure MI 13. Further, the mechanized line loss notifier data is supplemented with data reflecting the line loss notifiers sent via fax when requested by the CLEC.

To summarize the data sources for the overall volume data for the following periods:

October 2002 through January 2003

- Mechanized line loss notifier data are based on volumes processed through SBC's Operations Support Systems ("OSS").
 - These are the same data provided by SBC to the FCC in recent ex parte filings regarding line loss notifier issues.
- Data related to line loss notifiers sent via fax when requested by the CLEC is included.
- Michigan volume data is estimated based on an allocation factor developed from the February 2003 mechanized data used.¹

February 2003

- Mechanized line loss notifier data reflects an estimate of performance metrics data that would result if the new business rules for MI 13 were implemented.
 - This data allows Michigan volumes to be estimated directly.
- Data related to line loss notifiers sent via fax when requested by the CLEC is added; however, this
 data is only available on a regional basis and is allocated based on the data for mechanized line loss
 notifiers sent.

Performance Metrics data from the "old" MI 13 could not be used as it did not include line loss notifiers generated from "winback" activity and may not have generated a representative allocation factor.

LLN Notifier Interruption Report Filing April 10, 2003 Page 3

March 2003 and Forward

Antenell

- Actual performance metrics data for MI 13 will be used for mechanized line loss notifiers sent.
- Data related to line loss notifiers sent via fax when requested by the CLEC is added and will be available in such detail to do a Michigan volume calculation.

If you have any questions, please feel free to contact me at (313) 223-0729.

Sincerely,

Enclosures

cc: Mr. Thomas R. Lonergan Ms. Ann R. Schneidewind